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Counsel for Farrell Lines, Inc.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

AMERICAN STEAMSHIP OWNERS MUTUAL
PROTECTION AND INDEMNITY ASSOCIATION, INC.,

Plaintiff,

-against-

ALCOA STEAMSHIP CO., INC., et al.,

Defendants.

04 Civ. 04309 (LAK)
(JCF)

(ECF CASE)

**NOTICE OF
MOTION
IN LIMINE**

PLEASE TAKE NOTICE that upon the affidavit of Peter Adelman, Esq., the exhibits attached thereto, and the memorandum of law submitted herewith, Defendant Farrell Lines, Inc. will move this Court, located at 500 Pearl Street, Daniel Patrick Moynihan United States Courthouse, New York, New York 10007, in limine, for an Order excluding before trial (a) certain testimony as set forth in Exhibit A to the affidavit of Peter Adelman, Esq.; (b) the Rebuttal Declaration of Joseph E.M. Hughes; (c) the Rebuttal Expert Report of Richard H. Brown, Jr.; (d) the Rebuttal Expert Affidavit of Richard H. Brown, Jr.; and (e) Trial Exhibit PX-290; and granting such other and further relief as the Court deems just and proper.

Dated: New York, New York
July 14, 2006

BROWN RUDNICK BERLACK ISRAELS LLP

By: /s Peter Adelman
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To: All Counsel